

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MEDICAL IMAGING SOLUTIONS GROUP, INC.)

v.)

C.A. No. 05-10080 DPW

ALKOMED TECHNOLOGIES, LLC. and)
ALEXANDER KOUSPAKIAN)

PLAINTIFF'S ANSWER TO DEFENDANTS' COUNTERCLAIM

1. Plaintiff/defendant-in-counterclaim ("plaintiff") admits the allegations contained in paragraph 1 of the counterclaim of Defendants/plaintiffs-in-counterclaim ("defendants").

2. Plaintiff admits the allegations contained in paragraph 2 of defendants' counterclaim.

3. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 3 of defendants' counterclaim.

4. Plaintiff admits the allegations contained in paragraph 4 of defendants' counterclaim.

5. Plaintiff admits the allegations contained in paragraph 5 of defendants' counterclaim.

6. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 6 of defendants' Counterclaim.

7. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 7 of defendants' Counterclaim.

8. Plaintiff admits the allegations contained in paragraph 8 of defendants' counterclaim.

9. Plaintiff admits the allegations contained in paragraph 9 of defendants' counterclaim.

10. Plaintiff admits the allegations contained in paragraph 10 of defendants' counterclaim.

11. Plaintiff admits the allegations contained in paragraph 11 of defendants'

counterclaim.

12. Plaintiff admits the allegations contained in paragraph 12 of defendants' counterclaim.

13. Plaintiff admits the allegations contained in paragraph 13 of defendants' counterclaim.

14. Plaintiff denies the allegations contained in paragraph 14 of defendants' counterclaim.

15. Plaintiff admits the allegations contained in paragraph 15 of defendants' counterclaim.

16. Plaintiff admits the allegations contained in paragraph 16 of defendants' counterclaim.

17. Plaintiff admits the allegations contained in paragraph 17 of defendants' counterclaim.

18. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 18 of defendants' Counterclaim.

19. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 19 of defendants' Counterclaim.

20. Plaintiff denies the allegations contained in paragraph 20 of defendants' counterclaim.

21. Plaintiff admits the allegations contained in paragraph 21 of defendants' counterclaim.

22. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 22 of defendants' Counterclaim.

23. Plaintiff denies the allegations contained in paragraph 23 of defendants' counterclaim.

24. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 24 of defendants' Counterclaim.

25. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 25 of defendants' Counterclaim.

26. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 26 of defendants' Counterclaim.

27. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 27 of defendants' Counterclaim.

28. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 28 of defendants' Counterclaim.

29. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 29 of defendants' Counterclaim.

30. Plaintiff admits the allegations contained in paragraph 30 of defendants' counterclaim.

31. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 31 of defendants' Counterclaim.

32. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 32 of defendants' Counterclaim.

33. Plaintiff admits the allegations contained in paragraph 33 of defendants' counterclaim.

34. Plaintiff admits the allegations contained in paragraph 34 of defendants' counterclaim.

35. Plaintiff admits the allegations contained in paragraph 35 of defendants' counterclaim.

36. Plaintiff admits the allegations contained in paragraph 36 of defendants' counterclaim.

37. Plaintiff denies the allegations contained in paragraph 37 of defendants' counterclaim.

38. Plaintiff denies the allegations contained in paragraph 38 of defendants' counterclaim.

39. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 39 of defendants' Counterclaim.

40. Plaintiff admits the allegations contained in paragraph 40 of defendants'

counterclaim.

41. Plaintiff denies the allegations contained in paragraph 41 of defendants' counterclaim.

42. Plaintiff denies the allegations contained in paragraph 42 of defendants' counterclaim.

43. Plaintiff admits the allegations contained in paragraph 43 of defendants' counterclaim.

44. Plaintiff is without sufficient information to either admit or deny the allegations contained in paragraph 44 of defendants' Counterclaim.

45. Plaintiff denies the allegations contained in paragraph 45 of defendants' counterclaim.

46. Plaintiff denies the allegations contained in paragraph 46 of defendants' counterclaim.

47. Plaintiff denies the allegations contained in paragraph 47 of defendants' counterclaim.

48. Plaintiff denies the allegations contained in paragraph 48 of defendants' counterclaim.

49. Plaintiff restates and incorporates by reference the answers to the allegations contained in paragraphs 1 through 48 as set forth fully herein.

50. Plaintiff denies the allegations contained in paragraph 50 of defendants' counterclaim.

51. Plaintiff restates and incorporates by reference the answers to the allegations contained in paragraphs 1 through 50 as set forth fully herein.

52. Plaintiff denies the allegations contained in paragraph 52 of defendants' counterclaim.

AFFIRMATIVE DEFENSES

First Affirmative Defense

Defendants fail to allege damages the amount of which are sufficient to invoke the

jurisdiction of this Court.

Second Affirmative Defense

Defendants' claims are barred by the statute of frauds.

Third Affirmative Defense

Defendants failed to mitigate their damages.

Fourth Affirmative Defense

Defendants' claims should be dismissed for failure to state a claim upon which relief can be granted.

Fifth Affirmative Defense

Defendants have unclean hands and therefore their equitable claims are barred.

WHEREFORE, Plaintiff, Medical Imaging Solutions Group, Inc. respectfully requests that this Honorable Court:

- 1) Dismiss defendants' Counterclaim;
- 2) Award plaintiff's costs and reasonable attorneys' fees;
- 3) Grant such other relief as this Court deem just and proper.

/s/

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August 10, 2005

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Solutions Group, Inc.